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January 20, 2015

VIA ECF

Honorable Roanne L. Mann
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Cabrera v. Glenoak Enterprises LLC, et al.
Case No. 14 Civ. 5599 (FB)(RLM)

Dear Judge Mann:

This firm represents the defendants in connection with the above-referenced matter. On January 12, 2015, the plaintiff filed a letter requesting a pre-motion conference with respect to his anticipated motion for conditional collective action certification. In an electronic order dated January 16, 2015, Your Honor directed that the defendants' response is due today. I write to respectfully request a three day extension of time, until Friday January 23, 2015, for the defendants to respond to the plaintiff's pre-motion conference request letter. The reason for this request is that, although the defendants intend to oppose the plaintiff's anticipated motion for conditional certification, the parties are currently attempting to negotiate a potential resolution of these issues. If the parties are able to reach an agreement, it could result in a stipulation which would obviate the need for any motion practice with respect to the conditional certification of the plaintiff's purported FLSA collective action claims. This is the defendants' first request for such an extension of time. Counsel for the plaintiff consents to this request.

Respectfully submitted,

/s/Nils C. Shillito

Nils C. Shillito (NS-6755)

cc: C.K. Lee, Esq. (via ecf)